

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DELISE MONIQUE IDRIS

*

Plaintiff

*

v.

*

Civil Action No.:

RATNER COMPANY/CREATIVE
HAIRDRESSERS

*

*

Defendant

*

* * * * *

NOTICE OF REMOVAL

Petitioner/Defendant, Creative Hairdressers, Inc. (incorrectly named in the Complaint as Ratner Company/Creative Hairdressers), by its undersigned attorneys, pursuant to 28 U.S.C. §1441 *et. seq.*, files this Notice of Removal of this action from the Circuit Court for Montgomery County, Maryland, in which it is now pending, to the United States District Court for the District of Maryland, and in support thereof respectfully avers as follows:

1. Petitioner has been named as a Defendant in a suit filed in the Circuit Court for Montgomery County, Case No.: 383582-V. Suit was originally filed on October 29, 2013, and the Petitioner/Defendant was originally served on March 28, 2014.

2. That Defendant, Creative Hairdressers, Inc., is incorporated and has its principal place of business in the state of Virginia.

3. The above-entitled action is one in which this Court has original jurisdiction pursuant to Title 28 U.S.C. §1331, and Title 28 U.S.C. §1332. Petitioner seeks to remove this action to this Court under Title 28 U.S.C. §1441.

4. Filed herewith are copies of the Writ of Summons for Ratner Company/Creative Hairdressers (Exhibit A), Complaint and Plaintiff's Demand for Jury Trial (Exhibit B), Notice of

Dismissal (Exhibit C), Plaintiff's Line Entering Appearance of Counsel (Exhibit D), Motion to Vacate Dismissal (Exhibit E), Court Order Vacating Dismissal (Exhibit F), Circuit Court's Notices of Scheduling Hearings and Order of Court and Scheduling Order (Exhibit G).

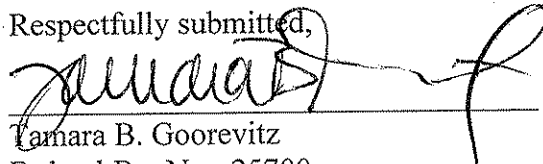
5. The above-entitled matter is a civil action in which the Plaintiff alleges discrimination under Title VII of the Civil Rights Act of 1964 on the part of the Petitioner.

6. Petitioner is entitled to removal because this is a federal question, there is complete diversity of citizenship between the Plaintiff and Defendant and the amount in controversy exceeds \$75,000. Plaintiff is a citizen of the State of Maryland. Defendant, Creative Hairdressers, Inc. is incorporated and has its principal place of business in the state of Virginia. Plaintiff's Complaint seeks judgment that "exceeds \$75,000.00."

7. All Defendants have been served and consent to this Removal.

WHEREFORE, Petitioner/Defendant, Creative Hairdressers, Inc. respectfully requests that the above-entitled action be removed from the Circuit Court for Montgomery County, Maryland to the United States District Court for the District of Maryland.

Respectfully submitted,



Tamara B. Goorevitz
Federal Bar No.: 25700

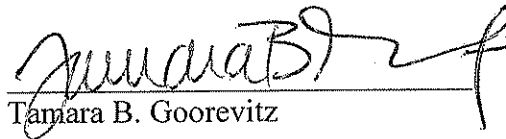
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of April, 2014, a copy of the

foregoing was sent by first class mail, to:

Jeanett P. Henry, Esquire
Rucker, Brown & Henry, P.C.
8701 Georgia Avenue, Suite 403
Silver Spring, MD 20910
Attorneys for Plaintiff


Tamara B. Goorevitz